

## EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. No. 05-10490 NMG

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NANCY BUCKLEY,  
Plaintiff )  
 )  
v. )  
 )  
CITY OF BROCKTON )  
SCHOOL DEPARTMENT, )  
Defendant )  

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**DEFENDANT, CITY OF BROCKTON'S FIRST SUPPLEMENTAL  
RULE 34 RESPONSE TO PLAINTIFF'S FIRST SET OF  
DOCUMENT REQUESTS**

Now comes the defendant, City of Brockton, and herein submits its First Supplemental Rule 34 Response to the plaintiff, Nancy Buckley's First set of Document Requests:

**REQUEST NO. 1.**

Any and all personnel policies, employee manuals, contracts, collective bargaining agreements, rules or regulations, website documents, Human Resources documents, or any other document stating the School Department's policies, practices, and procedures regarding any employment issue, including but not limited to promotions, discrimination based on gender and/or sex, and/or training of supervisors and administrators concerning discrimination.

RESPONSE NO. 1.

The City of Brockton agrees to produce any and all current personnel policies and employee manuals. A copy of its collective bargaining agreement from September 1, 2002 to August 31, 2005, is attached. Website documents should be equally available to plaintiff's counsel.

SUPPLEMENTAL RESPONSE NO. 1.

Attached is a copy of SECTION G, PERSONNEL.

REQUEST NO. 7.

Job descriptions of the positions of (a) elementary school teacher; (b) head of the Department of Social Studies; (c) assistant housemaster and (d) housemaster.

RESPONSE NO. 7.

The defendant agrees to produce copies of same for the time period of 2002-2005.

SUPPLEMENTAL RESPONSE NO. 7.

Attached are copies of the job descriptions for a-d.

REQUEST NO. 26.

Any and all documents concerning any and all job evaluations and/or performance reviews that the School Department and/or the School Board has conducted concerning Susan Szachowicz and/or Joseph Bage.

RESPONSE NO. 26.

OBJECTION. This request is overly broad and unduly burdensome. Without waiving said objection, the City of Brockton presently declines to produce same


without the express consent of Susan Szachowicz and/or Joseph Bage. Susan Szachowicz has declined said request.

SUPPLEMENTAL RESPONSE NO. 26.

Joseph Bage has declined said request.

THE DEFENDANT,  
City of Brockton  
By Its Attorney,

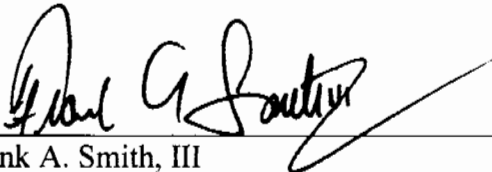
DATED: SEPTEMBER 30, 2005

  
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Frank A. Smith, III – BBO #467500  
FRANK A. SMITH, III & ASSOCIATES, P.C.  
11 Beacon Street, Suite 1200  
Boston, MA 02108  
(617) 723-3273

**CERTIFICATE OF SERVICE**

I, Frank A. Smith, III, Attorney for the defendant, City of Brockton School Department, hereby certify that I have this day, September 30, 2005, served a copy of the within DEFENDANT, CITY OF BROCKTON'S FIRST SUPPLEMENTAL RULE 34 RESPONSE TO PLAINTIFF'S FIRST SET OF DOCUMENT REQUESTS, by hand-delivering same, to:

Kevin G. Powers, Esquire  
Rodgers, Powers & Schwartz LLP  
18 Tremont Street  
Boston, MA 02108  
ATTORNEY FOR PLAINTIFF

  
\_\_\_\_\_  
Frank A. Smith, III